

AVROM R. VANN, P.C.
ATTORNEY-AT-LAW
2 UNIVERSITY PLAZA DRIVE - SUITE 600
HACKENSACK, NEW JERSEY 07610

(212) 382-1700

AVROM R. VANN, P.C.*

FACSIMILE NO. (212) 661-6976

*MEMBER NEW YORK
AND NEW JERSEY BARS

March 2, 2021

Hon. Robert D. Drain
Judge of the United States Bankruptcy Court
Southern District of New York
300 Quarropos Street - Suite 147
White Plains, New York 10601

Re: Mosdos Chofetz Chaim, Inc.
Case Number: Chapter 11 12-2361-rdd
Adversary Proceeding: 20-08949-rdd
Hearing Date: March 4, 2021

Dear Judge Drain:

I refer to the hearing presently scheduled for March 4, 2021 in the above referenced Adversary Proceeding. As the Court knows I was only recently retained to represent Mosdos Chofetz Chaim, Inc. in its capacity as a party plaintiff.

Although I have made a concerted effort to fully prepare myself for the forthcoming hearing, the enormous volume of documents which have been filed by the parties and witnesses including declarations and exhibits, makes it impossible for me to be adequately prepared to represent my client's interests in the forthcoming hearing in the manner which I would expect. Given that this matter has an extended history and as I see it there are no pressing issues which need to be immediately resolved and therefore there would not be any prejudice to the Defendants in the Adversary Proceeding were the hearing adjourned to a future date, I am respectfully requesting that the hearing date be adjourned to a future date convenient to the Court.

AVROM R. VANN, P.C.

Hon. Robert D. Drain
March 2, 2021

Page 2

I thank the Court in advance for its anticipated understanding and cooperation.

Respectfully submitted:

AVROM R. VANN, P.C.

S/ Avrom R. Vann

By: _____
Avrom R. Vann, Esquire

ARV: dat
cc: All Counsel of Record
Via Electronic Filing